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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

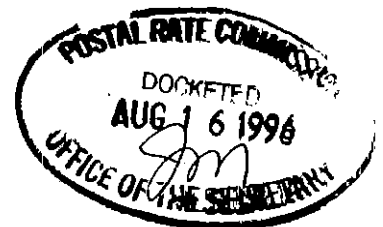
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-39-47)
(August 16, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

GAIL WILLETTE
Director
Office of the Consumer Advocate

DAVID RUDERMAN
Attorney



OCA/USPS-39. Please provide a description of all sample design, estimation, and data collection changes in the TRACS system since the FY 1993 sample.

OCA/USPS-40. Please provide an update to USPS-LR-G-106 documenting the FY 1995 TRACS sample design and variances.

OCA/USPS-41. Please provide a set of annual variance estimate tables for FY 1995 TRACS estimates that is comparable to the annual variance estimate tables provided in Docket No. R94-1 on pages A-H of USPS-LR-G-106.

OCA/USPS-42. Please refer to the TRACS estimation programs contained in SSR-82. Confidence intervals and c.v.'s for the highway distribution key estimates are provided as output from program TRACS.EXPAND.HWY.PQ495.CNTL(HWY11) on pages 337-340.

- a. Please confirm that the last print procedure of this program (lines 593-595 of page 327) prints SSR-82, page number 336.
- b. Please refer to the time stamps at the top of pages 336 and 337. Please confirm that SSR-82, page 337, was printed after page 336. If you do not confirm, please explain how the SAS time stamps should be interpreted.

- c. Please confirm that the sampling error estimates and confidence intervals at pages 337-340 are not produced by the program they are attached to. If you do not confirm, please provide a line reference to the appropriate section of TRACS.EXPAND.HWY.PQ495.CNTL(HWY11).
- d. If part (c) of this interrogatory is confirmed, please provide the program used to produce pages 337-340 along with documentation of the variance methodology used and formulas for its implementation. Please provide the program in electronic form and include with it all required input data files.
- e. Please confirm that the c.v.'s and confidence intervals provided on pages 337-340 are for distribution key estimates based on one quarter of data and cannot be compared to the annual highway cost c.v. estimates provided in USPS-LR-G-106. If you do not confirm, please explain.
- f. Please provide confidence intervals for the FY 1993 highway distribution key estimates in a form that can be compared to those included with the output of TRACS.EXPAND.HWY.PQ495.CNTL(HWY11).

OCA/USPS-43. Please refer to the TRACS estimation programs contained in SSR-82. Confidence intervals and c.v.'s for the rail distribution key estimates are provided as output from program TRACS.EXPAND.RAIL.PQ495.CNTL(RAIL8) on page 549.

- a. Please confirm that the last print procedure of this program (lines 102-104 of page 543) prints SSR-82, page number 548.
- b. Please refer to the date and time stamps at the top of pages 548 and 549. Please confirm that SSR-82, page 549, was printed one day after page 548. If you do not confirm, please explain how the SAS date and time stamps should be interpreted.
- c. Please confirm that the sampling error estimates and confidence intervals at page 549 are not produced by the program they are attached to. If you do not confirm, please provide a line reference to the appropriate section of TRACS.EXPAND.RAIL.PQ495.CNTL(RAIL8).
- d. If part (c) of this interrogatory is confirmed, please provide the program used to produce page 549 along with documentation of the variance methodology used and formulas for its implementation. Please provide the program in electronic form and include with it all required input data files.

- e. Please confirm that the c.v.'s and confidence intervals provided on page 549 are for distribution key estimates based on one quarter of data and cannot be compared to the annual rail cost c.v. estimates provided in USPS-LR-G-106. If you do not confirm, please explain.
- f. Please provide confidence intervals for the FY 1993 rail distribution key estimates in a form that can be compared to those included with the output of TRACS.EXPAND.RAIL.PQ495.CNTL(RAIL8).
- g. The documentation for the rail estimation programs begins on page 342 and explains that they apply to Postal Quarter 4 of FY 1995. However, the title of the table on page 549, "RAIL CONFIDENCE INTERVALS - PQ395," refers to Postal Quarter 3. Please explain this apparent discrepancy and provide confidence intervals appropriate for Postal Quarter 4.

OCA/USPS-44. Please provide a copy of the FY 1995 TRACS training manual analogous to USPS-LR-G-112 filed in Docket No. R94-1.

OCA/USPS-45. Please refer to the TRACS estimation programs contained in SSR-85. Confidence intervals and c.v.'s for the

Amtrak distribution key estimates are provided as output from program TRACS.EXPAND.AMTRAK.PQ495.CNTL(AMT10) on page 587.

- a. Please confirm that the last print procedure of this program (line 537 of page 575) prints SSR-85, page number 586.
- b. At page 539, the program execution date is listed as "01/31/96." Please refer to the date and time stamp at the top of page 587. Please confirm that SSR-85, page 587, was printed two and a half months after the program it is attached to was executed. If you do not confirm, please explain how the SAS date and time stamps should be interpreted.
- c. Please confirm that the sampling error estimates and confidence intervals at page 587 are not produced by the program they are attached to. If you do not confirm, please provide a line reference to the appropriate section of TRACS.EXPAND.AMTRAK.PQ495.CNTL(AMT10).
- d. If part (c) of this interrogatory is confirmed, please provide the program used to produce page 587 along with documentation of the variance methodology used and formulas for its implementation. Please provide the program in electronic form and include with it all required input data files.

- e. Please confirm that the c.v.'s and confidence intervals provided on page 587 are for distribution key estimates based on one quarter of data and cannot be compared to the annual passenger or freight rail cost c.v. estimates provided in USPS-LR-G-106. If you do not confirm, please explain. If you do confirm, please provide FY 1995 passenger and freight c.v. estimates in a form comparable to those in USPS-LR-G-106.

OCA/USPS-46. Please refer to the TRACS Eagle Network distribution key development for FY 1995.

- a. Please confirm that confidence intervals and c.v. tables have not been provided for these estimates. If you do not confirm, please provide a citation to the library reference containing this material.
- b. If you confirm part (a) of this interrogatory, please provide confidence intervals and c.v. tables for the distribution keys developed for the TRACS Eagle Network system. Please provide documentation for the variance methodology used and formulas for its implementation. Please provide the variance programs in electronic form and include all required input data files.

c. Please provide confidence intervals and c.v. tables for the TRACS Eagle Network system in a form that is comparable to the annual variance estimates provided in USPS-LR-G-106.

OCA/USPS-47. For each component of the TRACS system, please provide the sample size (number of primary sampling units and number of secondary sampling units), corresponding universe sizes, and sampling rate by sampling strata. Please provide this sample design documentation separately for FY 1993 and for FY 1995.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.



DAVID RUDERMAN
Attorney

Washington, D.C. 20268-0002
August 16, 1996